

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

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In Re:	)	Chapter 11
KAL FREIGHT, INC., <i>et al.</i> ,	)	Case No. 24-90614-cml
Debtors. <sup>1</sup>	)	(Jointly Administered)
	)	

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**PACCAR FINANCIAL CORP.’S JOINDER TO MITSUBISHI HC CAPITAL CANADA,  
INC., TRUIST EQUIPMENT FINANCE CORPORATION, DE LAGE LANDEN  
FINANCIAL SERVICES, LLC, AND FIFTH THIRD BANK, N.A.’S OBJECTION TO  
FINAL APPROVAL AND CONFIRMATION OF DEBTORS’ THIRD AMENDED AND  
RESTATED COMBINED DISCLOSURE STATEMENT AND PLAN OF LIQUIDATION**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

NOW COMES PACCAR Financial Corp. (hereinafter “PACCAR”), and files this its Joinder to Mitsubishi HC Capital Canada Inc., Truist Equipment Finance Corp., De Lage Landen Financial Services, LLC, and Fifth Third Bank, N.A.’s *Objection to Final Approval of and Confirmation of the Third Amended and Restated Combined Disclosure Statement and Plan of Liquidation of Kal Freight Inc. and Its Affiliated Debtors under Chapter 11 of the Bankruptcy Code* (the “Objection”) [Doc. # 904] and for same would respectfully show the Court as follows:

1. PACCAR is a secured creditor in this case who financed fifty (50) 2024 Peterbilt 579s (the “Vehicles”) for Debtors.

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification numbers, are: Kal Freight Inc. (0249); Kal Aviation LLC (2600); Kal Partz Inc. (0139); Kal Trailers & Leasing Inc. (0840); and KVL Tires Inc. (0320). The location of the Debtors’ service address in these Chapter 11 cases is 10156 Live Oak Ave., Fontana, CA 92335.

2. Debtors used the Vehicles in their operations prior to and throughout the pendency of this case. However, PACCAR has not received any payments from Debtors since August of 2024.

3. On March 26, 2025, Debtors filed their Third Amended Plan of Liquidation [Doc. # 845] (the “Plan”). Debtors seek approval of the Plan on an expedited basis. The Plan provides a murky and imbalanced treatment of Administrative Claim Holders, one of which being PACCAR, and contains impermissible releases and injunction.

**I.**

**Joinder to Objection**

4. The Objection was filed on April 4, 2025, and PACCAR joins in the Objection.

WHEREFORE, Premises Considered, PACCAR incorporates by reference the Objection and joins in the Objection, and requests that the Court deny confirmation of the Plan and grant to PACCAR any and all relief to which it is justly entitled.

**Respectfully Submitted,**

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**CERTIFICATE OF SERVICE**

The undersigned converted the foregoing document into an electronic image, via portable document format (.pdf), electronically submitted same to the Internet web portal for the Clerk of this Court utilizing the Electronic Management and Electronic Case Filing system of the Court, which has caused service, via Simple Mail Transfer Protocol (e-mail), of a Notice of Electronic Filing of this imaged document to all parties receiving ECF notification in this case on April 4, 2025.

*/s/ Matthew D. Giadrosich*  
Matthew D. Giadrosich